

UNITED STATES DISTRICT COURT
DISTRICT COURT

2005 11 17 10:27


TIMOTHY L. LaFRENIER,)	
Plaintiff)	C. A. NO: 04-40114-FDS
)	
v.)	
)	
MARY ANNE KINIREY,)	
DANIEL MORRISON,)	
CHIEF OF POLICE "JOHN DOE")	
and THE TOWN OF TOWNSEND)	
)	

PLAINTIFF'S MOTION TO AMEND COMPLAINT IN
THE ABOVE CAPTIONED MATTER

The plaintiff in the above caption moves that this Honorable Court allow him to amend the complaint, noted above. In support of the instant motion, the plaintiff states:

1. That the amendment is limited exclusively to changing the complaint to include the name of the Townsend Police Chief at the time the instant causes of actions arose; he is presently referred to in the complaint as "John Doe";
2. In the context of the complaint, the amendment is more as to form than substance.
3. The amendment is in the interest of justice.
4. Counsel has conferred with Attorney Tehan who is representing the Town on the instant complaint with respect to this amendment.

Respectfully Submitted,


Sean J. Gallagher
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Tel. no. 508 767 0500
B.B.O. no. 551112
Date: March 21, 2005

Certificate of service

I, Sean J. Gallagher, Esq. certify that on March 21, 2005 I mailed, first class postage prepaid, the above amended complaint to Attorney Joseph J. Teehan, Kopelman and Paige, P.C., Attorneys at Law, 31 St. James Street, Boston MA 02116.
Signed under the pains and penalties of perjury.


Sean J. Gallagher, Esq.